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Lowdown Distribution, Inc.

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH
CENTRAL DIVISION**

LL&L INNOVATIONS LLC, a Utah) Civil Action No. 2:10-cv-00829-TC
limited liability company, and LOWDOWN)
DISTRIBUTION, INC., a California)
corporation,,)
Plaintiffs,)
v.)
JERRY LEIGH OF CALIFORNIA, INC.,)
a California corporation; KOHL'S)
CORPORATION, a Wisconsin)
corporation; JC PENNEY COMPANY,)
INC., a Texas corporation; RUSTY)
NORTH AMERICA, LLC, a California)
limited liability company; HOT TOPIC)
MERCHANDISING, INC, a California)
corporation, and SUN COAST)
MERCHANDISE CORPORATION d/b/a)
SUNSCOPE, a California corporation,)
Defendants.)

Plaintiffs LL&L Innovations LLC and Lowdown Distribution, Inc. ("Plaintiffs"), by and through their counsel of record, and pursuant to FED. R. CIV. P. 7(b)(1) and DUCivR 7-1(a), hereby move this Court for entry of Judge Campbell's standard Protective Order in patent cases.

The underlying litigation involves a claim for patent infringement. Thus, confidential trade secrets and/or other proprietary information relating to patents and other business information will be disclosed during the course of the litigation by the parties and by non-parties. Therefore, Plaintiffs request that this Court enter Judge Campbell's standard Protective Order in patent cases.

The grounds for this motion are more fully set forth in the accompanying supportive memorandum filed concurrently herewith, together with all other pleadings and papers on file in this matter. Plaintiffs' proposed Protective Order is attached as Exhibit A to the accompanying supportive memorandum and modifies Judge Campbell's form Protective Order only to identify the litigants and the patent at issue.

DATED this 2nd day of March, 2011.

KIRTON & McCONKIE

s/ James B. Belshe
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Attorneys for Plaintiff
Lowdown Distribution, Inc.

WORKMAN NYDEGGER

s/ Chad E. Nydegger
Chad E. Nydegger
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LL&L Innovations, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this the 2nd day of March, 2011, a copy of the foregoing was filed electronically through the Court's CM/ECF system, which caused service upon all counsel registered thereon.

/s/ Heather Bartlett
Heather Bartlett

4829-1478-3752.1